

**Federal Defenders
OF NEW YORK, INC.**

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March 3, 2022

Via ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Willie Dennis
20 Cr. 623 (LGS)**

Dear Judge Schofield,

I write on behalf of Mr. Dennis in the above-captioned matter to respectfully request a one-month adjournment of the motions schedule in this matter. The Government consents to this request.

On December 6, 2021, the Court entered a scheduling order, which provided, in relevant part, for the government to produce its discovery by January 18, 2022 and for the defense's motions (if any) to be filed by March 25, 2022. (Doc. 17.) As reflected in the parties' status letter of January 31, 2022, the Government has made three productions of a voluminous amount of discovery, and it is still conducting its "responsiveness" review of data collected from electronic accounts pursuant to search warrants. (Doc. 28.)

Given the large volume of disclosure material that has been turned over to the defense, and in light of the undersigned's commitments on a trial in another matter that is commencing on March 8, 2022 and expected to last for approximately one month, the defense respectfully requests that the Court adjourn the motions schedule for one month.

The parties propose the following dates:

- Defense motions: April 25, 2022
- Government response: May 16, 2022
- Defense replies: May 26, 2022
- Conference: At the Court's convenience on or after June 2, 2022

The defense consents to the exclusion of time until the adjourned conference date.

U.S. v. Dennis
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We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Neil Kelly

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cc: AUSA Sarah Kushner